



October 16, 2024

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**VIA ECF**

Hon. Ona T. Wang  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: *The Center for Investigative Reporting, Inc. v. OpenAI Inc., et al.* No. 24-cv-04872 –Joint Proposed Agenda**

Dear Judge Wang:

Pursuant to the Court's September 13, 2024 Order (ECF No. 85), the parties provide the following joint proposed agenda for the October 30, 2024 status hearing, which the Court has also set as a Rule 16 conference. Plaintiff has leave of all Defendants to file this letter jointly on behalf of all parties to this action.

The parties jointly filed their Rule 26(f) report concurrently with this letter. At the October 30, 2024 hearing, the parties will be prepared to discuss (1) scheduling and other Rule 26 and Rule 16 issues set forth in the Rule 26(f) report; (2) Defendants' motion to consolidate this case with the *New York Times* and *Daily News* cases (ECF No. 92); (3) deposition coordination across cases; and (4) any other issues raised by the Court. The parties will have fully briefed Defendants' motion by the October 30 hearing.

Respectfully submitted,

/s/ Matthew Topic

Matthew Topic (*pro hac vice*)  
LOEVY & LOEVY  
*Counsel for Plaintiff*

/s/ Paven Malhotra

Paven Malhotra  
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/s/ Annette L. Hurst

Annette L. Hurst

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cc: All counsel of record (via ECF)

